

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RICHARD SNYDER,

Plaintiff,

v.

GPM2, LLC, CHRISTY MANAGEMENT, LLC,
BONNIE BENSON, P.A., THE FELTON BANK
OF DELAWARE, JAMES P. CONNOR, JR.,
UNKNOWN TITLE INSURANCE COMPANY
and SERGOVIC & ELLIS, P.A.,

Defendants.

C.A. No. 07-00066 GMS

MOTION TO DISMISS

Defendant, Christy Management, LLC, moves to dismiss Plaintiff's complaint for:

- (1) Lack of subject matter jurisdiction – Fed. R. Civ. P. 12(b)(1)
- (2) Failure to state a claim upon which relief can be granted – Fed. R. Civ. P. 12 (b)(6).

The grounds for this motion are set forth in Defendant Christy Management, LLC's Opening Brief in Support of Its Motion to Dismiss filed contemporaneously herewith.

MORRIS JAMES LLP

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Attorneys for Defendant
Christy Management, LLC

March 29, 2007

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 29, 2007 two copies of the foregoing **MOTION TO DISMISS** were served by first class mail, postage prepaid, upon the following:

Richard Snyder
P.O. Box 374
Davidsonville, MD 21035

and

Richard Snyder
23 Harbor Road
Rehoboth, DE 19971

/s/ John H. Newcomer, Jr.

John H. Newcomer, Jr.